

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STRAGENT, LLC, <i>et al.</i>,	§	
	§	
<i>Plaintiffs,</i>	§	Civil Action No. 6:11-CV-278-LED-JDL
	§	
v.	§	
	§	JURY TRIAL DEMANDED
PIONEER ELECTRONICS (USA) INC.,	§	
<i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

**JOINT NOTICE OF SETTLEMENT
AND MOTION TO STAY ALL DEADLINES**

Plaintiffs Stragent, LLC and TAG Foundation and Defendants Pioneer Electronics (USA) Inc., Pioneer North America, Inc., and Pioneer Corporation (collectively “Pioneer”), jointly notify the Court that Plaintiffs and Pioneer have reached an agreement in principle to settle the above-referenced litigation and that Pioneer will be dismissed from this civil action as a result of that settlement agreement after certain conditions are met. The parties anticipate that such dismissal will be filed within 60 days, and, thus, move to stay all deadlines by and between plaintiffs and Pioneer for the next 60 days.

WHEREFORE, PREMISES CONSIDERED, the parties pray that the Court stay all deadlines in this case by and between them as set forth, and for all other relief to which they are justly entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric M. Albritton", is written over a horizontal line.

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Respectfully submitted,

/s/ John G. Smith (with permission)

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 14th day of May 2012.


Eric M. Albritton

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and that all parties join the foregoing motion.


Eric M. Albritton